

JS 44 (Rev. 04/21)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

EDAWRD O'REGAN and ANA VIQUEZ
as Parents and Natural Guardians of L.O.

(b) County of Residence of First Listed Plaintiff Bucks
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

David S. Dessen, Esq. 600 Easton Road, Willow Grove,
PA 19090, 215-496-2902, ddessen@dms-lawyer.com

DEFENDANTS

CENTRAL BUCKS SCHOOL DISTRICT

County of Residence of First Listed Defendant Bucks
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input checked="" type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C 1983

Brief description of cause:
Denial of procedural due process; unlawful Title IX grievance proceeding

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

12/3/2024

SIGNATURE OF ATTORNEY OF RECORD

David S. Dessen

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

10/2024

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DESIGNATION FORM

Place of Accident, Incident, or Transaction: 20 Welden Road, Doylestown, PA 18901

RELATED CASE IF ANY: Case Number: _____ Judge: _____

- | | |
|---|---|
| 1. Does this case involve property included in an earlier numbered suit? | Yes <input checked="" type="checkbox"/> |
| 2. Does this case involve a transaction or occurrence which was the subject of an earlier numbered suit? | Yes <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent which was the subject of an earlier numbered suit? | Yes <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus petition, social security appeal, or pro se case filed by the same individual? | Yes <input checked="" type="checkbox"/> |
| 5. Is this case related to an earlier numbered suit even though none of the above categories apply?
If yes, attach an explanation. | Yes <input checked="" type="checkbox"/> |

I certify that, to the best of my knowledge and belief, the within case ☐ is / ☒ is **not** related to any pending or previously terminated action in this court.

Civil Litigation Categories

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts)
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Wage and Hour Class Action/Collective Action
- ☐ 6. Patent
- ☐ 7. Copyright/Trademark
- ☐ 8. Employment
- ☐ 9. Labor-Management Relations
- ☒ 10. Civil Rights
- ☐ 11. Habeas Corpus
- ☐ 12. Securities Cases
- ☐ 13. Social Security Review Cases
- ☐ 14. Qui Tam Cases
- ☐ 15. Cases Seeking Systemic Relief ***see certification below***
- ☐ 16. All Other Federal Question Cases. (Please specify): _____

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify): _____
- ☐ 7. Products Liability
- ☐ 8. All Other Diversity Cases: (Please specify) _____

I certify that, to the best of my knowledge and belief, that the remedy sought in this case ☐ does / ☒ does **not** have implications beyond the parties before the court and ☐ does / ☒ does **not** seek to bar or mandate statewide or nationwide enforcement of a state or federal law including a rule, regulation, policy, or order of the executive branch or a state or federal agency, whether by declaratory judgment and/or any form of injunctive relief.

ARBITRATION CERTIFICATION (CHECK ONLY ONE BOX BELOW)

I certify that, to the best of my knowledge and belief:

☒ Pursuant to Local Civil Rule 53.2(3), this case is not eligible for arbitration either because (1) it seeks relief other than money damages; (2) the money damages sought are in excess of \$150,000 exclusive of interest and costs; (3) it is a social security case, includes a prisoner as a party, or alleges a violation of a right secured by the U.S. Constitution, or (4) jurisdiction is based in whole or in part on 28 U.S.C. § 1343.

☐ None of the restrictions in Local Civil Rule 53.2 apply and this case is eligible for arbitration.

NOTE: A trial de novo will be by jury only if there has been compliance with F.R.C.P. 38.

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

EDWARD O'REGAN and ANA VIQUEZ
as Parents and Natural Guardians of L.O.¹
45 Woodview Drive
Chalfont, PA 18914,
Plaintiffs

vs.

No.

CENTRAL BUCKS SCHOOL DISTRICT
20 Welden Drive
Doylestown, PA 18901,
Defendant

COMPLAINT

PARTIES

1. Plaintiffs Edward O'Regan and Ana Viquez (hereinafter referred to as "O'Regan") are adult individuals residing at 45 Woodview Drive, Chalfont, PA 18914 and the parents and natural guardians of their minor son, L.O.

2. Defendant Central Bucks School District (hereinafter referred to as "School District") is a municipal school district organized and existing under the laws of the Commonwealth of Pennsylvania, with its principle office located at 16 Welden Drive, Doylestown, PA 18901.

3. At all times relevant to the events set forth in this Complaint, L.O was a 10th grade student at Central Bucks High School – South (hereinafter referred to as the "high school"), a high school operated and maintained by the School District.

JURISDICTION AND VENUE

¹ L.O. and other minors are identified only by the initials of their first and last names.

4. This Court has jurisdiction to decide O'Regan's claims pursuant to 28 U.S.C. § 1331 and 28 U.S.C § 1343.

5. Pursuant to 28 U.S.C. §1391(b)(1) and (2), venue is proper in this Court since the Defendant resides in the Eastern District of Pennsylvania and all of the events at issue took place in the Eastern District of Pennsylvania.

FACTS

6. L.O., D.F., J.F. and R.W. are male 10th grade students at the high school.

7. D.F. and J.F. are brothers.

8. G.R. is a 19-year old woman with Down's Syndrome and a student at the high school.

9. In the afternoon, L.O., D.F., J.F. R.W and G.R. are transported from the high school to their homes on School District bus 357.

10. On September 16, 23, 24, 25, 26 and 27, 2024, various interactions took place between L.O., D.F., J.F., R.W. and G.R. on bus 357 including a physical altercation between D.F. and G.R. during the afternoon of September 23, 2024.

11. Between September 16, 2024 and October 1, 2024, neither L.O., D.F., J.F., R.W. nor G.R. made a complaint to the School District alleging that they were discriminated against because of their sex or harassed because of their sex as a result of anything that occurred on bus 357.

12. On or about October 1, 2024, J.F. told Erin Scholl, his education support teacher, about the incident on bus 357 that occurred on September 23, 2024 as well as about various other incidents on bus 357 in which G.R. was involved.

13. The next day, October 2, 2024, Ms. Scholl sent an email summarizing her conversation with J.F. to Jennifer Opdyke, the high school Class of 2027 House Principal.

14. After reading Ms. Scholl's email, Ms. Opdyke started an investigation and spoke with J.F., D.F. and G.R. as well as with their parents.

15. During the interviews with Ms. Opdyke, neither J.F., D.F., G.R. nor any of their parents alleged that any student was discriminated against because of their sex or harassed because of their sex as a result of anything that occurred on bus 357.

16. On October 4, 2024, as part of her investigation, Ms. Opdyke began to review video footage of the events on bus 357 beginning with events that occurred on September 16, 2024.

17. Also, on October 4, 2024, Ms. Opdyke spoke with Becky Stern and Special Education Supervisor Ron Lock.

18. At Mr. Lock's suggestion, Ms. Opdyke contacted Alyssa Wright (hereinafter referred to as "Wright"), the School District Title IX Coordinator.

19. Wright determined that the incident on the school bus should be investigated under Title IX of the Education Amendments of 1972, 20 U.S.C. §§ 1681, *et seq.* (hereinafter referred to as the "Title IX proceeding").

20. On October 18, 2024, after reviewing additional video footage of events on bus 357 between September 16, 2024 and September 27, 2024 and conducting additional interviews with students and parents, Ms. Opdyke completed the School District's Reporting Form for Discrimination, Bullying and Harassment in violation of School District Policies 104 and 108.

21. In the form, Ms. Opdyke alleged that G.R., D.F. and J.F. had discriminated and harassed each other on the basis of age, sex and disability. A copy of the form signed by Ms. Opdyke is attached hereto and marked Exhibit “A.”

22. On October 18, 2024, based upon the form signed by Ms. Opdyke, Wright sent O’Regan a Notice of Complaint Received form. A copy of the Notice is attached hereto as Exhibit “B.”

23. In the Notice, Wright informed O’Regan that:

[T]he District received a report of conduct on October 2, 2024, that could potentially constitute unlawful sex-based harassment. Your child, L.O. was named as a **RESPONDENT**, meaning that your child may be responsible for violating the policy prohibiting sex-based harassment. The report indicates that the name of the targeted student, called the **COMPLAINANT**, is G.R., who is a student at CB South. The other parties are D.F., J.F. L.O. and R. W. who are students at CB South.

24. The Notice alleges that:

L.O. was observed engaging in conversation about the incident, cursing loudly, and appeared to be video recording an interaction between G.R. and D.F. Additionally, he was also observed on bus footage discussing with another peer that he had a video of one of the incidents in question and proceeded to show the video to that peer.

25. On October 2, 2024, the School District did not receive a formal complaint from G.R. that L.O. had discriminated or harassed her because of her sex.

26. In an email dated November 5, 2024, Kalani Linnell, Esquire, counsel for the School District, stated that the School District viewed the October 18, 2024 Notice from Wright as initiating an alleged Title IX proceeding in which G.R. is a Complainant against L.O., D.F. J.F. and R.W. and in which L.O., D.F., J.F. and R.W. are each a Complaint against G.R. A copy of the Linnell email is attached hereto as Exhibit “C.”

27. On November 18, 2024, Michael Raffaele, Esquire, counsel for G.R. wrote to Linnell on behalf of Ilene Young, Esquire, counsel for D.F. and J.F. and undersigned counsel, to advise the School District that in their collective opinion, counsel believed it was, among other things, improper for the School District to pursue the individual claims alleged against the students in one proceeding. A copy of Mr. Raffaele's letter is attached hereto as Exhibit "D."

28. Counsel for the School District responded the same day and stated that because, according to the School District, L.O., D.F., J.F., and R.W. acted in concert to target G.R. relating to her disability, and because G.R. displayed her inappropriate conduct to all the students at the same time, "the decision-maker needs to understand the full scope and totality of the circumstances to make a rational decision." A copy of Ms. Linnell's letter is attached hereto as Exhibit "E."

29. On November 14, 2024, the School District sent O'Regan a document setting forth the School District's proposed informal resolution of the alleged pending Title IX proceeding. The School District's proposed informal resolution of the pending Title IX proceeding is attached hereto as Exhibit "F."

30. Among other things, the proposed informal resolution of the alleged pending Title IX proceeding would discipline L.O. by imposing a 2 day out of school suspension.

31. Under the grievance process adopted by the School District to resolve the alleged Title IX violations, a single decision-maker will decide each of the boy's claims against G.R. and G.R.'s claims against each of the boys.

32. L.O. has a legally protected liberty and property interest in a school record free of reports of discipline imposed by the School District.

COUNT I – 28 U.S.C. § 2201
DECLARATORY JUDGMENT
Edward O'Regan and Ana Viquez as Parents and Natural Guardians of L.O. v.
Central Bucks School District

33. O'Regan hereby incorporates paragraphs 1 through 32 inclusive as though fully set forth at length.

34. A "Complainant" in a Title IX proceeding is "an individual who is alleged to be the victim of conduct that could constitute sexual harassment.", 34 C.F.R. § 1601.30.²

35. "Sexual Harassment" is conduct on the basis of sex that satisfies one or more of the following:

- (1) An employee of the recipient conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct;
- (2) Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the recipient's education program or activity; or
- (3) "Sexual assault" as defined in 20 U.S.C. 092(f)(6)(A)(v), "dating violence" as defined in 34 U.S.C. 12291(a)(10), "domestic violence" as defined in 34 U.S.C. 12291(a)(8), or "stalking" as defined in 34 U.S.C. 12291(a)(30).

34 C.F.R. §1601.30.

36. A Title IX grievance procedure may only be instituted after the receipt of a "formal complaint" that has either been filed by the complainant or signed by the Title IX Coordinator., 34 C.F.R. §1601.30.

² The cited definitions appear in § 1601.30 of the Final Regulation adopted May 19, 2020.

37. The Notice provided by the School District to L.O. and O'Regan is not based upon a formal complaint of sexual harassment from G.R.

38. The School District, in an unlawful attempt to discipline L.O., has:

- a. Falsely represented to L.O. and O'Regan that the Notice provided on October 18, 2024 instituted a lawful Title IX proceeding against L.O.;
- b. Falsely represented to L.O. and O'Regan that G.R. has alleged that she was sexually harassed by L.O.;
- c. Falsely represented to L.O. and O'Regan that the conduct described in the October 18, 2024 Notice can be considered sexual harassment as defined in 34 C.F.R. §1601.30 and
- d. Falsely representing to L.O. and O'Regan that the document attached to the email Notice was the formal complaint required by 34 C.F.R. §1601.30 to institute a lawful Title IX grievance proceeding.

WHEREFORE, Plaintiffs Edward O'Regan and Ana Viquez as Parents and Natural Guardians of L.O., respectfully request this Court to:

- A. Declare that the School District's ongoing grievance proceeding against L.O. is unlawful;
- B. Declare that the conduct attributed to L.O. set forth in the October 18, 2024 Notice from Alysia Wright is not sexual harassment as defined in 34 C.F.R. §1601.30 and
- C. Order such other relief that this Court deems just and proper.

COUNT II – 42 U.S.C. § 1983
VIOLATION OF 42 U.S.C. § 1983
Edward O'Regan and Ana Viquez as Parents and Natural Guardians of L.O. v.
Central Bucks School District

39. O'Regan hereby incorporates paragraphs 1 through 38 inclusive as though fully set forth at length.

40. Each of the actions taken by the School District as set forth above was taken pursuant to the authority granted to the School District by the laws of the Commonwealth of Pennsylvania.

41. Parties to a grievance proceeding alleging a violation of Title IX are entitled to procedural due process.

42. Procedural due process requires that a party be afforded the right to notice of significant deprivations of liberty or property and to a meaningful opportunity to be heard.

43. The grievance proceeding adopted by the School District which requires L.O. to present to the same decision-maker evidence in support of his claims against G.R. and evidence to rebut G.R.'s claim against him denies L.O. a meaningful opportunity to be heard on either claim.

44. The School District's grievance procedure forces L.O. to potentially not introduce all the relevant evidence or make all the relevant arguments in defense of G.R.'s claims against him because the same decision-maker will also decide L.O.'s claims against G.R., since by introducing all the relevant evidence or making all the relevant arguments in defense of G.R.'s claims, L.O. may undermine and weaken his claims against G.R.

45. Similarly, the School District's grievance procedure forces L.O. not to introduce all the potentially relevant evidence or make all the relevant arguments in support of his claim against G.R. because the same decision-maker will also decide

G.R.'s claims against L.O., thereby precluding L.O. from introducing all the relevant evidence or making all the relevant arguments in support of L.O.'s claims against G.R., because such evidence or argument may undermine and weaken his defense of G.R.'s claims against him.

46. The one decision-maker procedure adopted by the School District denies L.O. the right to be fully and meaningfully heard and, therefore, denies L.O. the right to due process guaranteed by the *Fourteenth Amendment*.

47. The grievance process adopted by the School District denies L.O. a meaningful opportunity to be heard as either a respondent or a complainant by not providing a separate decision-maker to decide L.O.'s claims as a complainant and defense as a respondent.

WHEREFORE, Plaintiffs Edward O'Regan and Ana Viquez, as Parents and Natural Guardians of L.O., respectfully request that this Court:

A. Declare that the one decision-maker grievance procedure adopted by the Central Bucks School District does not comport with the due process clause of the *Fourteenth Amendment*;

B. Enjoin the Central Bucks School District from pursuing any alleged violations of Title IX by L.O. until it adopts a procedure in which one decision-maker decides L.O.'s claims against G.R and a separate decision-maker decides G.R.'s claims against L.O.;

C. Award O'Regan reasonable attorney's fees and the costs of suit and

D. Order such other relief that this Court deems just and proper.

DESSEN, MOSES & ROSSITTO

Dated: December 3, 2024

By: /s/ David S. Dessen
DAVID S. DESSEN, ESQUIRE
Attorney ID # 17627
Attorney for Plaintiffs

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